



Order Filed on March 8, 2024
by Clerk,
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

20-10212 BKMFR01
BROCK & SCOTT, PLLC
302 Fellowship Rd, Suite 130
Mount Laurel, NJ 08054
(844) 856-6646
Attorneys for WILMINGTON SAVINGS FUND
SOCIETY, FSB, AS TRUSTEE OF WILMINGTON
SAVINGS FUND SOCIETY, FSB, AS TRUSTEE OF
I

In Re:

ANTHONY VINCENT WOLKE

Case No: 23-21502-SLM

Hearing Date: February 21,
2024

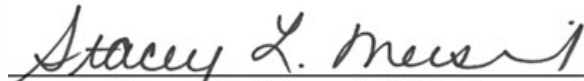
Judge: STACEY L. MEISEL

Chapter: 11

AGREED ORDER RESOLVING IN REM MOTION FOR RELIEF FROM STAY

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**

DATED: March 8, 2024


Honorable Stacey L. Meisel
United States Bankruptcy Judge

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In Re:

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Hearing Date: February 21,
2024

Judge: STACEY L. MEISEL

Chapter: 11

**ORDER MODIFYING §362 AUTOMATIC STAY OR IN THE ALTERNATIVE
GRANTING ADEQUATE PROTECTION**

The Consent Order pertains to the property located at 73 Hubbardton Road, Wayne, NJ 07470, mortgage account ending with "7952";

This Matter having been brought before the Court by, David L Stevens, Esquire, attorney for Debtor, Anthony Vincent Wolke (hereinafter the "Debtor"), upon the filing of a Chapter 11 Plan, Wilmington Savings Fund Society, Fsb, As Trustee of Wilmington Savings Fund Society, Fsb, As Trustee Of Stanwich Mortgage Loan Trust I (hereinafter the "Creditor") by and through its attorneys, Brock and Scott, PLLC, having filed an Objection to the Confirmation of said Chapter 11 Plan and the Parties having subsequently resolved their differences; and the Court noting the consent of the parties of the form, substance and entry of the within Order, and for other and good cause shown:

1. The Parties agree that the Debtor shall immediately begin tendering Adequate Protection Payments of \$7,203.42 within 10 days of the entry of this Order and shall continue to tender the payments on the 1st of each month until Confirmation of the Chapter 11 Plan occurs and then the Chapter 11 Plan Terms will apply thereafter; and it is further

2. The Parties agree that if the Debtor fails to tender the required Adequate Protection payments (pre-confirmation) or any post-confirmation payments in the time frame as set forth with the mortgage and note contracts then Creditor may issue a Notice of Default to Debtor's Counsel

and the Debtor shall have 10 days to cure, if the delinquency is not cured within 10 days then Creditor may file a Certification of Default with the Court and the Court shall enter an order granting Creditor In Rem Relief from the Automatic stay of all proceedings, as provided under 11 U.S.C §362(d)(4) with regard to the property known as **73 Hubbardton Road, Wayne, NJ 07470** (hereinafter the Premises) (as more fully set forth in the legal description attached to the Mortgage of record granted against the Premises), as to allow Movant, its successors or assignees, to proceed with its State Court rights as allowed under the terms of the Mortgage and Note contracts.

3. The Parties agree that the terms of this agreement shall be made part of any proposed Chapter 11 Plan filed with regard to Creditor.

4. Rule 4001(a)(3) is not applicable and may immediately enforce and implement this Order Granting In Rem Relief from the Automatic Stay and Co-Debtor Stay.

The undersigned hereby consent to the form,
Content and entry of the within Order:

BROCK AND SCOTT, PLLC

WILMINGTON SAVINGS FUND SOCIETY,
FSB, AS TRUSTEE OF WILMINGTON
SAVINGS FUND SOCIETY, FSB, AS
TRUSTEE OF I

By Its Attorney,

/s/ Andrew L. Spivack

Andrew L. Spivack, Esquire
(Bar No. 018141999)

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Dr.

Winston-Salem, NC 27103

Telephone: 844-856-6646

Facsimile: 704-369-0760

E-Mail: NJBKR@brockandscott.com

Dated: March 7, 2024

DEBTOR

By Their Attorney,

/s/


David L. Stevens, Scura, Wigfield, Heyer &
Stevens, Esquire

Attorney for Debtor

1599 Hamburg Turnpike,

Wayne, NJ 07470

Phone Number: 973-696-8391

Email: dstevens@scura.com

Dated: 1 Mar 2024